UNITED ENVIRONMENTAL PROTECTION AGENCY
REGION 5, WPTD, ECAB, DE-9J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	3M Precision Optics Inc.
EPA ID No.:	OHD 982 072 696
ADDRESS:	3997 McMann Road Cincinnati, OH 45245
FACILITY TYPE/ PRIORITY SECTOR:	All Other Plastic Product Manufacturing Other Computer Peripheral Equipment Manufacturing
RCRA DESIGNATION:	Large Quantity Generator
NAICS CODE:	326199, 334119
FACILITY REPRESENTATIVES	Bev Carter, Environmental Health and Safety Supervisor Stacey Johnson, Sr. Division Environmental Engineer
U.S.EPA INSPECTOR:	Derrick Samaranski, LCD, RCRA, CS2
OEPA INSPECTOR:	Tom Ontko, Environmental Specialist
DATE OF INSPECTION:	November 9, 2007

PREPARED BY: Derrick Samaranski — **Derrick Samaranski** — 11/26/07 — **Date Completed**

ACCEPTED BY: **Paul Little, Chief**
Compliance Section 2 — 11/20/07 — **Date**

Purpose of the Inspection:

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the 3M Precision Optics Inc. facility (3M Precision Optics) for the management of its Resource Conservation and Recovery Act (RCRA) regulated waste. The inspection was conducted under a joint effort with the Ohio Environmental Protection Agency (OEPA). (U.S. EPA led inspection).

Facility Description:

The 3M Precision Optics plant specializes in the production and development of prototypes, enhancement films, and plastic lenses for optical applications. 3M Precision Optics products find use in cell phones, projectors, Home Theater and Simulation, and concert lighting. In addition to lens manufacturing, and research and development work 3M Precision Optics also conducts assembly work of optical components and finishing operations of glass lenses. Manufacturing operations at the 3M Precision Optics plant include: injection molding plastic lens production, lens polishing, grinding, painting, coating, and cleaning. Support operations include: machine tooling, waste water treatment, and maintenance. 3M Precision Optics site occupies nine acres and the plant currently employs 160 people divided between office personnel, manufacturing, and R and D.

Manufacturing, and research and development operations at the 3M Precision Optics facility generates solid and hazardous waste streams that include: waste waters from lens cleaning, grinding and polishing operations; sludge wastes; excess lens material; defective products; waste paint; contaminated debris; waste cleaning solutions; corrosive wastes; spent solvents; scrap metal, used oil; universal waste lamps and mercury; circuit boards; and batteries. In addition the 3M Precision Optics conducts a chemical inventory of its labs and generates lab packs of hazardous wastes. Universal waste lamps, mercury, batteries, circuit boards, and scrap metals are offered for off-site recycling.

3M Precision Optics facility used analytical analysis, process knowledge, and Material Data Safety Sheets (MSDS) to characterize its hazardous waste streams, which are accumulated on-site in satellite containers, and less than 90-day storage area, Table 1 lists 3M Precision Optics's hazardous waste streams and their approximate generation rates:

Waste Type	Potential Hazardous Constituent/Characteristic	EPA Waste Code	Generation Rate
Contaminated Process Equipment	Barium, Lead	D005, D008	59,900 lbs/yr
Waste from Paint Operation	Ignitability	D001, F003	500 lbs/month

Evaporator Concentrate Sludge (WWT)	Arsenic, Barium, Chromium, Lead	D004, D005, D007, D008	125 lbs/month
Solvent Contaminated Debris	Arsenic, Barium, Chromium, Lead, MEK, Ignitability	D004, D005, D007, D008, D035	400 lbs/ month
LZ-80 Mineral Oil	Barium, Lead	D005, D008	1100 lbs/month
Aerosol Cans	Ignitability	D001	90 lbs/month
Lab Packs	Ignitability, Corrosivity	D001, D002, U080	115 lbs/month

Table 1: Wastes Generated at the 3M Precision Optics Facility

3M Precision Optics currently operates as a large quantity generator of hazardous waste, but in the future the generator status of the facility might change due to recent closure of the 4000 McMann Road facility.

Facility Inspection and Observations:

We arrived at the location of the 3M Precision Optics Inc. at 10:15 AM, and proceeded to the reception area where we were directed by a sign to report to the security office across the street at the 4000 McMann Road. The security office at the 4000 McMann location was closed, so Mr. Ontko called Mrs. Carter, the 3M Precision Optics environmental contact. I spoke briefly with Mrs. Carter, who explained that 3M operations at the 4000 McMann Road were terminated in late 2006, and that she would meet us in the lobby of the 3997 McMann Road building.

In the lobby of the 3997 McMann Road building, we were met by Mrs. Stacy Johnson and Mrs. Carter. At that time I explained the purpose of our visit, and presented my official credentials. After introductions, we were invited to an opening conference during which we learned that 3M Precision Optics terminated manufacturing operations at the 4000 McMann Road location, sold the property, and no longer had access to it. We were told that 3M operated three less than 90-day hazardous waste storage areas, and several satellite areas at the 4000 McMann Road location. Hazardous wastes generated during the closure operations were manifested off-site (contaminated equipment, debris). After the opening conference we began a walk-through of the 3997 McMann facility (12:00 PM).

Site Walk-through (Derrick Samaranski, Tom Ontko, Stacy Johnson, Bev Carter)

The Concentrate Evaporator Area

The site walk-through of the facility hazardous waste operations started with a visit to the concentrate evaporator area, where 3M Precision Optics treats wastewaters from floor cleaning in the process areas, and coolant from the tooling area. Wastewaters contain

metal shavings that are separated by a metal screen from the liquids before processing the wastewaters in the evaporator unit. During our visit, we observed metal shavings collecting on the metal screen. According to Mrs. Carter and Johnson, the metal shavings have not been analyzed to determine if they are hazardous wastes. 3M Precision Optics accumulates the metal shavings on site in containers and then offers them for recycling. The metal shavings are shipped off-site to Way-out Recycling, OH facility. The treatment of cleaning mop water and coolant generates D004, D005, D007, D008 hazardous waste sludge stream that is accumulated near the process in 55-gallon satellite containers. The 55-gallon satellite container accumulating the hazardous sludge waste at the time of our visit was labeled as "Hazardous Waste," was closed and accumulating wastes. In addition to the satellite sludge container, we also observed two 55-gallon drums that were labeled as "Used Oil." One of the used oil drums was empty while the other one was accumulating used oil. 3M Precision Optics generates used oil from the injection molding machines. Before leaving the concentrate evaporator area we looked at the fresh mop cleaning solution tank, and noticed liquid on the floor around the tank. According to Mrs. Johnson the cleaning solution tank had developed a small leak, and 3M Precision Optics was in the process of locating the leak and fixing the problem. The area around the cleaning solution tank was bermed and the spills were being contained within the bermed area. I asked if the cleaning solution was a hazardous waste when disposed and was told that the cleaning solution was not a hazardous waste (verified with MSDS for the cleaning solutions).

Injection Molding Area

Next, we visited the plastic injection molding machine area where 3M Precision Optics manufactures and processes optical lenses. The area generates hazardous waste contaminated debris from solvent lens cleaning. We looked at two 5-gallon satellite containers near work benches generating the hazardous waste debris. Both containers were closed, labeled "Hazardous Waste," and accumulating. According to Mrs. Carter, 3M employees working in the area segregate the solvent contaminated debris from the non-contaminated debris which is managed in regular trash bins.

Tooling Shop

From the injection molding area we proceeded to the tooling area where 3M Precision Optics generates hazardous waste contaminated debris, scrap metals (aluminum), waste coolant liquid, and spent acid cleaner. The hazardous waste debris is accumulated in satellite containers, and we observed a 5-gallon satellite container accumulating hazardous waste debris near one of the machines. The debris satellite container was closed, labeled "Hazardous Waste," and accumulating. During our visit to the tooling shop, we spoke with Travis Vaughn, and Paul Kimble. Mr. Vaughn explained that waste liquids like: cooling liquid from the tooling machines which is transferred in small containers, floor cleaning solution wastes, and spilled liquids which are managed by a shop vacuum, are all treated in the waste water evaporator unit. Mr. Vaughn took us to a separate area of the tooling shop were we observed a second 5-gallon satellite container of hazardous waste debris (labeled "Hazardous Waste," closed, accumulating), and acid

parts cleaner which is used for removal of rust and oil from small parts. According to Mr. Vaughn and Mr. Kimble, the spent acid is transferred in a 1-gallon plastic bottle, which previously held fresh product, to the facility's hazardous waste storage area where it is labeled by Mrs. Carter. 3M Precision Optics generates about three gallons per year of the spent acid cleaner. The plastic acid bottle is also used to catch overfill acid from the cleaning bath, and we observed a small plastic hose running from the bath to the bottle. At the time of our visit the acid catch bottle did not have a hazardous waste label or other wording that might indicate that waste acid might be accumulated in the bottle. The acid bottle was empty during our visit. Near the acid cleaner we also observed a 5-gallon container of NaOH product that in the past was used to neutralize the waste acid cleaner. It is not clear how 3M Precision Optics will manage the NaOH product. After our visit to the tooling shop, I explained to Mrs. Carter that the spent acid container would need to be labeled as "Hazardous Waste" if it were to accumulate overfill cleaning acid.

R and D (Home Theater and Simulations Area)

Next, we briefly visited the HTNS area where we observed accumulation of defective lenses and pieces in a 55-gallon satellite container, and waste debris in two 5-gallon containers near working areas. All of the satellite containers were labeled as "Hazardous Waste," closed, and accumulating.

Paint Room

From the R and D area we inspected satellite containers in the small paint room where 3M precision Optics generates waste paint, spent solvent, waste thinner, waste Teflon lens coating product, and waste debris. The liquid hazardous wastes in the paint room were being accumulated in a 30-gallon drum in a flammable locker, and the hazardous waste debris in a 20-gallon container. Both containers were labeled "Hazardous Waste," closed, and accumulating.

Lens Polishing and Materials Lab

Next, we visited a former glass polishing area that at the time of our visit was being used for research and development work on plastics lenses. The only waste stream generated from the area is a wastewater stream from floor cleaning and is managed in the wastewater evaporator. The second plastic lens polishing (acrylic) area operates a wastewater treatment unit to process the wastewaters generated from the polishing operations. Treated water is directed to the sewer and the non-hazardous waste sludge is accumulated in the bin and disposed in the trash. 3M Precision Optics analyzed the acrylic sludge waste stream on 02/07/2007 and determined that the acrylic sludge is a non-hazardous waste stream. From the lens polishing areas we inspected a flammable locker in the materials (chemical) lab, where 3M was holding two 5-gallon satellite containers of hazardous waste debris, and saline waste (D001, D002). Both containers were labeled "Hazardous Waste," closed, and accumulating.

Less than 90-days Storage Area and Universal Waste Areas

From the materials lab we proceeded to inspect 3M Precision Optics' less than 90-day hazardous waste storage area where at the time of our visit the facility was accumulating four 55-gallon drums of hazardous waste debris, one 55-gallon drum of waste aerosol waste, and 30-gallon drum of waste paint. All of the hazardous waste containers in the hazardous waste storage area were properly labeled, closed and dated. The drum with oldest accumulation start date was dated 08/28/2007. 3M also operates a solid debris compactor, and stores virgin Teflon material in a container in a flammable locker in the less than 90-day hazardous waste storage area. At the time of our visit the flammable locker holding Teflon material was labeled as "Hazardous waste" even though it was used for storing a raw material (verified by a label on the container). I explained to Mrs. Carter that the label on the flammable locker was confusing and should be removed unless the facility planned on storing hazardous waste materials in the locker. The 3M hazardous waste storage area is equipped with an overhead sprinkler system, and there are spill kits near the area, and an emergency phone nearby. Used oil drums are accumulated against a wall across from the less than 90-day storage area in 55-gallon drums. The used oil drums were labeled as "Used Oil." No issues of concern were noted as a result of our visit to the facility's less than 90-day hazardous waste storage area.

In a hallway, around the corner from the 3M Precision Optics less than 90-day hazardous waste storage area, we inspected a flammable locker used for accumulation of universal mercury wastes and batteries. Batteries are offered for recycling back to the manufacturer (Tri-City Industrial Power), and mercury wastes are offered to Lamp Tracker.

The facility walk-through ended with a visit to the maintenance area where 3M accumulates universal waste lamps. During our visit, we observed several boxes accumulating fluorescent lamps, and some (about eight) loose high intensity discharge, and fluorescent lamps on shelving next to the boxes. The boxes with universal lamps were properly labeled and dated. Mrs. Carter stated that she would inquire about the management of the loose lamps from the maintenance personnel and get back to me after the inspection. The walkthrough ended at 1:30PM.

Records Review (Derrick Samaranski, Tom Ontko, Stacy Johnson, Bev Carter)

For the hazardous waste management records review at the 3M facility I requested to see: hazardous wastes manifests for the last three years of operation (2007, 2006, 2005), sample of employee training records, weekly inspection reports of the 90-day hazardous waste storage areas, used oil shipment documents, waste analysis records, contingency plan, Land Disposal Restriction forms, and shipment documents for the recycled batteries, and universal wastes. First, I reviewed the weekly inspection records of the facility's hazardous waste storage areas. Until January of 2007 3M operated three less than 90-day hazardous waste storage areas at the 4000 McMann Road location: MMS, MME, and outdoor roll-off box. Weekly inspection records for the 4000 McMann Road location revealed that 3M continued to conduct weekly inspections of the hazardous

waste storage areas until all hazardous wastes from each storage area were shipped off-site. Last shipment of hazardous wastes from the 4000 McMann Road occurred on 10/17/2007 and included 10 55-gallons of glass hazardous waste resulting from site closure operations. Weekly inspection records for the 3997 McMann Road less than 90-day hazardous waste storage area (MMW) revealed that 3M failed to conduct a weekly inspection of the storage area during the time period of 06/27/2007-07/11/2007. No other issues of concern were noted regarding the weekly inspection records.

Next, I reviewed a sample of hazardous waste training records for Tony Cofrancesco, who is responsible for moving hazardous waste containers to the facility's hazardous waste storage area; Paul Kimball, and Travis Vaughn, who work in the tooling area; Bev Carter and Stacey Johnson who are responsible for hazardous waste management activities at the facility. 3M implements on-line training program to conduct environmental training, testing, and retention of training records. The training records I reviewed only covered training dating back to 2006. Older records were kept in a different database not immediately accessible or were archived.

For hazardous waste manifest review, I reviewed manifest records for off-site shipments conducted in 2007, and 2006, and Mr. Ontko reviewed 2005 manifests. No issues of concern were noted as a result of the manifest review.

Next, I reviewed the used oil shipment documents and universal waste shipment documents. 3M ships its used oil to Safety Clean, and universal mercury waste to Eco-Flow. Last shipment of universal wastes occurred on 04/05/2007, and used oil was shipped on 03/17/2007.

Contingency Plan review revealed that 3M failed to include the home address of the alternate emergency coordinator (Stacy Johnson) in the plan.

The records review finished with a review of the 3M waste stream determination records. 3M conducts annual testing and re-testing of waste streams generated at the facility. I looked at a sample of records for 2006, and 2007. I obtained a copy of the list of waste streams that were sampled in 2007.

Records not immediately available during the inspection were to be provided after the inspection.

Closing Conference

The 3M hazardous waste inspection ended with closing conference and discussion of closure issues of the 4000 McMann Road location.

3M Precision Optics
OHD 982072 696
4/11/03/2007

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
≥1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
E: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes	☒	No	☐	N/A	☐
2.	Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]	Yes	☒	No	☐	N/A	☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes	☒	No	☐	N/A	☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]	Yes	☐	No	☒	N/A	☐
5.	Are annual reports kept on file for at least 3 years?[3745-52-40(B)]	Yes	☒	No	☐	N/A	☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes	☐	No	☒	N/A	☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)]	Yes	☐	No	☒	N/A	☐
8.	Does the generator accumulate hazardous waste?	Yes	☒	No	☐	N/A	☐

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)?	Yes	☐	No	☒	N/A	☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]

a.	Container that meets 3745-66-70 to 3745-66-77?	Yes	☐	No	☒	N/A	☐
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	Yes	☐	No	☒	N/A	☐
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes	☐	No	☒	N/A	☐
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes	☐	No	☒	N/A	☐

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes	☐	No	☒	N/A	☐
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes	☐	No	☐	N/A	☒
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes	☐	No	☐	N/A	☒
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes	☐	No	☐	N/A	☒
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes	☐	No	☐	N/A	☒
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes	☐	No	☐	N/A	☒

MANIFEST REQUIREMENTS

12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)]	Yes	☒	No	☐	N/A	☐
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]	Yes	☒	No	☐	N/A	☐

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes	☒	No	☐	N/A	☐

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes	☐	No	☐	N/A	☒
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & 2)]	Yes	☒	No	☐	N/A	☐

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes ☐ No ☐ N/A ☒
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ☐ No ☐ N/A ☒
19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes ☒ No ☐ N/A ☐

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes ☒ No ☐ N/A ☐
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ☒ No ☐ N/A ☐
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☒ No ☐ N/A ☐
25. Does the generator keep records and documentation of:
    a. Job titles [3745-65-16D(1)]? Yes ☒ No ☐ N/A ☐
    b. Job descriptions [3745-65-16D(2)]? Yes ☒ No ☐ N/A ☐
    c. Type and amount of training given to each person[3745-65-16D(3)]? Yes ☒ No ☐ N/A ☐
    d. Completed training or job experience required [3745-65-16D(4)]? Yes ☒ No ☐ N/A ☐
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☒ No ☐ N/A ☐
28. Does the plan describe the following:
    a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes ☒ No ☐ N/A ☐
    b. Arrangements with emergency authorities [3745-65-52(C)]. Yes ☒ No ☐ N/A ☐
    c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] (missing address for alternate emergency coord.) Yes ☒ No ☐ N/A ☐
    d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes ☒ No ☐ N/A ☐

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to Incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

s a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities hat may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes ☒ No ☐ N/A ☐

30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes ☒ No ☐ N/A ☐

31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be throughly familiar with: (a) all aspects of the facility's contingency plan: (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ☐ No ☒ N/A ☐
    a. Was the contingency plan implemented? [3745-65-51(B)] Yes ☐ No ☐ N/A ☒
    b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ☐ No ☐ N/A ☒
    c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes ☒ No ☐ N/A ☐

34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
    a. Internal communications or alarm system? [3745-65-32(A)] Yes ☒ No ☐ N/A ☐
    b. Emergency communication device? [3745-65-32(B)] Yes ☒ No ☐ N/A ☐
    c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes ☒ No ☐ N/A ☐
    d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes ☒ No ☐ N/A ☐

NOTE: Verify that the equipment is listed in the contingency plan.

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☒ No ☐ N/A ☐

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ☒ No ☐ N/A ☐

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes ☒ No ☐ N/A ☐

38. If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes ☐ No ☐ N/A ☒

39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☒ No ☐ N/A ☐

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes ☒ No ☐ N/A ☐

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)? Yes ☐ No ☐ N/A ☒

SATELLITE ACCUMULATION AREA REQUIREMENTS

42. Does the generator ensure that satellite accumulation area(s):
    a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐
    b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐
    c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☒ No ☐ N/A ☐

d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes ☐ No ☐ N/A ☒

e. Containers are closed, in good condition and compatible with wastes stored in them?[3745-52-34(C)(1)(a)] Yes ☒ No ☐ N/A ☐

f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes ☒ No ☐ N/A ☐

43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes ☐ No ☒ N/A ☐

a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)] Yes ☐ No ☐ N/A ☒

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☒ No ☐ N/A ☐

45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☒ No ☐ N/A ☐

46. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☒ No ☐ N/A ☐

b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐

c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes ☐ No ☒ N/A ☐

a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☒ No ☐ N/A ☐

48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☒ No ☐ N/A ☐

49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes ☐ No ☐ N/A ☒

50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes ☐ No ☐ N/A ☒

51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] Yes ☒ No ☐ N/A ☐

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

53. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes ☒ No ☐ N/A ☐

54. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☒ No ☐ N/A ☐

55. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes X No___ N/A ___RMK#____

    a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No ☐ N/A X RMK#___

NOTE: Accumulation is defined as date generated or date received from another handler.

12. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] Yes X No ☐ N/A ___RMK#___

    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes X No___ N/A ___RMK#____

    b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes___ No___ N/A X RMK#____

    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes___ No___ N/A X RMK#____

    d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes X No___ N/A ___RMK#____

    e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes X No___ N/A ___RMK#____

    f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes___ No___ N/A X RMK#____

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes X No ❑ N/A ___RMK#___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes X No ❑ N/A ___RMK#___

15. Is the material released characterized? [3745-273-17(B)]

Yes X No ❑ N/A ___RMK#___

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes X No ❑ N/A ___RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a SQUWH self-transports waste, then they must comply with the Universal Waste transporter requirements.***

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes X No ❑ N/A ___RMK#___

NOTE: ***SQUWHs are prohibited to send waste to any other facility.***

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes X No ❑ N/A ___RMK#___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes X No ❑ N/A ___RMK#___

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>:

a. Receive the waste back? [3745-273-18(E)(1)]

Yes X No___ N/A ___RMK#___

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes___ No___ N/A X RMK#___

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: Yes ___ No ☐ N/A X RMK#___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes___ No___ N/A X RMK#___

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes___ No___ N/A X RMK#___

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes ___ No ☐ N/A X RMK#___

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes ___ No ☐ N/A X RMK#___

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes___ No___ N/A X RMK#___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] Yes ___ No ☐ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes ___ No ☐ N/A X RMK#___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No ☐ N/A X RMK#___

REMARKS

#1) loose lamps in the UV lamp Area. Unlabeled and uncontainerized.

SM Precision Optics
OHD 982 072 696
11/05/07

USED OIL INSPECTION CHECKLIST (Long Version)

PROHIBITIONS

Is used oil being managed in a surface impoundment or waste pile? If so: — Yes___No X N/A ___RMK#___

Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] — Yes ___ No ☐ N/A X RMK#___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] — Yes ☐ No ____ N/A X RMK#___

3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? — Yes ___ No ☐ N/A X RMK#___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] — Yes ___ No ☒ N/A ___RMK#___

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] — Yes X No ☐ N/A ___RMK#___

6. Does the generator only store used oil in tanks, containers;or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] — Yes X No ☐ N/A ___RMK#___

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] — Yes X No ☐ N/A ___RMK#___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] — Yes X No ☐ N/A ___RMK#___

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

   a. Stopped the release? — Yes ___ No ☐ N/A X RMK#___

   b. Contained the release? — Yes ___ No ☐ N/A X RMK#___

   c. Cleaned up and properly managed the used oil and other materials? — Yes ___ No ☐ N/A X RMK#___

   d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? — Yes ___ No ☐ N/A X RMK#___

J. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: — Yes___No X N/A ___RMK#___

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ___ No ❑ N/A X RMK#___

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ___ No ❑ N/A X RMK#___

c. Are the combustion gases from heater vented to the ambient air? Yes ___ No ❑ N/A X RMK#___

11. Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes X No ❑ N/A ___RMK#___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ___ No ❑ N/A ___RMK#___

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No ❑ N/A ___RMK#___

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No ❑ N/A ___RMK#___

N/A

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes ___ No ❑ N/A ___RMK#___

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes___No___ N/A ___RMK#___

    Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No ❑ N/A ___RMK#___

17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)] Yes ___ No ❑ N/A ___RMK#___

18. Has the used oil transporter delivered all used oil to:

    a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)] Yes ___ No ❑ N/A ___RMK#___

    b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)] Yes ___ No ❑ N/A ___RMK#___

    c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)] Yes ___ No ❑ N/A ___RMK#___

    d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes ___ No ❑ N/A ___RMK#___

19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes ___ No ❑ N/A ___RMK#___

20. Has the used oil transporter had a discharge of used oil? If so: Yes___No___ N/A ___RMK#___

    Did they take the appropriate action as outlined in 3745-279-43(C)? Yes ___ No ❑ N/A ___RMK#___

21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes ___ No ❑ N/A ___RMK#___

22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)] Yes ___ No ❑ N/A ___RMK#___

23. Does the owner/operator of a used oil transfer facility:

    a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)] Yes ___ No ❑ N/A ___RMK#___

b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil: [3745-279-45(H)]

N/A

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ___ No ❑ N/A ___RMK#___

25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date delivered? [3745-279-46] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No ❑ N/A ___RMK#___

26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No ❑ N/A ___RMK#___

27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No ❑ N/A ___RMK#___

28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes___No___ N/A ___RMK#___

If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No ❑ N/A ___RMK#___

REMARKS

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)] Yes ___ No ❑ N/A ___RMK#___

30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:

a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? Yes ___ No ❑ N/A ___RMK#___

c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes ___ No ❑ N/A ___RMK#___

31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:

a. Has a contingency plan been developed? [3745-279-52(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes ___ No ❑ N/A ___RMK#___

c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? Yes ___ No ❑ N/A ___RMK#___

e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes ___ No ❑ N/A ___RMK#___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes ___ No ❑ N/A ___RMK#___

Does/has the used oil processor/re-refiner:

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-54(A)] Yes ___ No ❑ N/A ___RMK#___

b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers as required by 3745-279-54(C)? Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes ___ No ❑ N/A ___RMK#___

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 and, if applicable 3745-279-72? [3745-279-55] Yes ___ No ❑ N/A ___RMK#___

35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes ___ No ❑ N/A ___RMK#___

36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No ❑ N/A ___RMK#___

37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No ❑ N/A ___RMK#___

38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No ❑ N/A ___RMK#___

a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No ❑ N/A ___RMK#___

b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No ❑ N/A ___RMK#___

39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:

a. The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58] Yes ___ No ❑ N/A ___RMK#___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes ___ No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] Yes ___ No ❑ N/A ___RMK#___

43. Does the used oil burner process used oil? [3745-279-61(B)] Yes___No___ N/A ___RMK#___

If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] Yes ___ No ❑ N/A ___RMK#___

44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-62(A)] Yes ___ No ❑ N/A ___RMK#___

45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] Yes ___ No ❑ N/A ___RMK#___

46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] Yes ___ No ❑ N/A ___RMK#___

47. Does the used oil burner:

a. Only store used oil in tanks, containers; or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-64(A)] Yes ___ No ❑ N/A ___RMK#___

b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] Yes ___ No ❑ N/A ___RMK#___

c. Provided secondary containment for containers as required by 3745-279-64(C)? Yes ___ No ❑ N/A ___RMK#___

d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes ___ No ❑ N/A ___RMK#___

e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes ___ No ❑ N/A ___RMK#___

f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

48. Does the used oil burner keep a record or each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes ___ No ❑ N/A ___RMK#___

49. Are the records described in 3745-279-65(A) maintained for at least three years? [3745-279-65(B)] Yes ___ No ❑ N/A ___RMK#___

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes ___ No ❑ N/A ___RMK#___

51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes ___ No ❑ N/A ___RMK#___

52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes___No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of **off-spec** used oil only to a used oil burner that has an a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] Yes ___ No ❑ N/A ___RMK#___

54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes ___ No ❑ N/A ___RMK#___

55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] Yes ___ No ❑ N/A ___RMK#___

56. Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes ___ No ❑ N/A ___RMK#___

57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] Yes ___ No ❑ N/A ___RMK#___

58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes ___ No ❑ N/A ___RMK#___

59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of **off-spec** used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)] Yes ___ No ❑ N/A ___RMK#___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)] Yes ___ No ❑ N/A ___RMK#___

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REMARKS

N/A

3M Precision optics
OHD 982 072 696

?R REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so**: Yes X No ❑ N/A ___RMK#___

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) Yes X No ❑ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes X No ❑ N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___ RMK#___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___ RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] — Yes ☒ No ☐ N/A ___RMK#___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] — Yes ☒ No ☐ N/A ___RMK#___

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.*[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] — Yes ☐ No___ N/A ☒ RMK#___

   Note: In other words, is combustion a legitimate treatment method

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] — Yes ☐ No ☒ N/A ___RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** — Yes___ No ☒ N/A ___ RMK#___

    a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:** Yes ___ No _X_ N/A ___RMK#___

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:** Yes ___ No _X_ N/A ___RMK#___

a. Has the facility complied with 3745-270-04? Yes ___ No ❑ N/A _X_RMK#___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] — Yes X No ☐ N/A ___ RMK#___

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] — Yes ___ No ☐ N/A X RMK#___

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] — Yes ___ No ☐ N/A X RMK#___

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] — Yes ___ No ☐ N/A X RMK#___

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** — Yes___ No X N/A ___ RMK#___

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] — Yes ___ No ☐ N/A X RMK#___

NOTE: *Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit.*(See 270-07(A)(7))

18. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] — Yes X No ☐ N/A ___ RMK#___

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

	Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?	Yes___ No X N/A ___ RMK#___
2.	If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]	Yes ___ No ❑ N/A X RMK#___
	a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)]	Yes ___ No ❑ N/A X RMK#___
	b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)]	Yes ___ No ❑ N/A X RMK#___
3.	Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)]	Yes ___ No ❑ N/A X RMK#___
4.	Have the treated wastes met the applicable treatment standards in 3745-270-40?	Yes ___ No ❑ N/A X RMK#___

NOTE: *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*

5.	Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)]	Yes ___ No ❑ N/A X RMK#___
6.	Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)]	Yes ___ No ❑ N/A X RMK#___
7.	Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:	Yes ___ No ❑ N/A X RMK#___
	i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)]	Yes ___ No ❑ N/A X RMK#___
	ii. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]	Yes ___ No ❑ N/A X RMK#___

NOTE: *If the waste will be treated and monitored for **all** UHCs then they do not need to be listed on the notice.*

8.	Has the process/operation generating the waste or the solid waste landfill facility changed? If so:	Yes___ No___ N/A X RMK#___

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] — Yes ___ No ❑ N/A X RMK#___

b. Has the director been notified of such changes? [3745-270-09(D)] — Yes ___ No ❑ N/A X RMK#___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: — Yes___ No X N/A ___ RMK#___

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] — Yes ___ No ❑ N/A X RMK#___

10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] — Yes ___ No ❑ N/A X RMK#___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? — Yes X No___ N/A X RMK#___

	Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.)	Yes___ No___ N/A X RMK#___
3.	Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:	Yes___ No___ N/A X RMK#___
	a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]	Yes ___ No ☐ N/A ___RMK#___

NOTE: *If immobilization has been used in a treatment train, it must be the last treatment technology used.*

4.	Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:	Yes___ No___ N/A X RMK#___
	a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]	Yes ___ No ☐ N/A X RMK#___
5.	Is the waste a PCB waste under 40 CFR Part 761? If so:	Yes___ No___ N/A X RMK#___
	a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]	Yes ___ No ☐ N/A X RMK#___
6.	Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]	Yes ___ No ☐ N/A X RMK#___
7.	Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?	
	a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]	Yes___ No___ N/A X RMK#___
	b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]	Yes ___ No ☐ N/A X RMK#___
	c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]	Yes ___ No ☐ N/A X RMK#___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] — Yes ___ No ❑ N/A X RMK#___

   a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] — Yes___ No___ N/A X RMK#___

   b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] — Yes ___ No ❑ N/A X RMK#___

   c. Technology used from Table 1? [3745-270-07(D)(1)(c)] — Yes ___ No ❑ N/A X RMK#___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)] — Yes ___ No ❑ N/A X RMK#___

REMARKS

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] — Yes ___ No ☐ N/A ___ RMK#___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] — Yes ___ No ☐ N/A ___ RMK#___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] — Yes ___ No ☐ N/A ___ RMK#___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so**: — Yes___ No___ N/A ___ RMK#___

   a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] — Yes ___ No ☐ N/A ___ RMK#___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:** — Yes___ No___ N/A ___ RMK#___

   a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)], excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] — Yes ___ No ☐ N/A ___ RMK#___

   b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] — Yes ___ No ☐ N/A ___ RMK#___

   c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)] — Yes ___ No ☐ N/A ___ RMK#___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] — Yes ___ No ☐ N/A ___ RMK#___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: — Yes ___ No___ N/A ___ RMK#___

a. Copies of all notices and certifications required in 3745-270? Yes ___ No ❑ N/A X RMK#___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No ❑ N/A X RMK#___

c. Followed the testing frequency specified in the facility's WAP? Yes ___ No ❑ N/A X RMK#___

REMARKS

OHD 982 072 696
3M Precision optics
11/09/2007

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	**Do any of the following exclusions apply? If yes, please circle.**	YES	(NO)

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG=s and SQG=s are exempt**

CC-2	265.1083	**Do any of the following exemptions apply? If yes, please circle**	YES	(NO)

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	**Waste Determination:**	(Determination Not Needed)	**Determination Needed**

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	(OK)	DF

CONTAINER MANAGEMENT 265.1087

(Level 1)	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. Ain light material service@ (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process
CC-4 265.1087 Controls		
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1		Level 2	Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CC -5	265.1087	**Waste transfer requirements**				
No waste transfer requirements apply OK		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087	**Operating requirements**				
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access OK 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)			-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in AProcedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure@ under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	**Inspection requirements**				
Minimal inspection required: OK - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)			Inspection requirements are the same as for tanks			
CC- 8	265.1087	**Repair requirements**				
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired ok 265.1087(c)(4), (d)(4)			Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	**Recordkeeping requirements**				
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in	Since Level 2 waste is Ain light material service@, no records need to be kept OK		Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

light material service		

Comments: